

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

**IN RE WILMINGTON TRUST
SECURITIES LITIGATION**

This document relates to: **ALL ACTIONS**

Master File No. 10-cv-00990-ER

(Securities Class Action)

Hon. Eduardo Robreno

ELECTRONICALLY FILED

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENTS AND PLAN OF ALLOCATION**

Pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlements and Providing for Notice dated July 10, 2018 (D.I. 825), and upon (i) the Joint Declaration of Hannah Ross and Joseph E. White, III in Support of (I) Lead Plaintiffs' Motion for Final Approval of Class Action Settlements and Plan of Allocation and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; (ii) the Brief in Support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlements and Plan of Allocation; and (iii) all other papers and proceedings herein, Lead Plaintiffs the Merced County Employees' Retirement Association, the Coral Springs Police Pension Fund, the St. Petersburg Firefighters' Retirement System, the Pompano Beach General Employees Retirement System, and the Automotive Industries Pension Trust Fund (collectively, "Lead Plaintiffs"), will and hereby do move this Court, before the Honorable Eduardo C. Robreno, on November 5, 2018 at 10:00 AM at the United States District Court for the Eastern District of Pennsylvania, James A. Byrne Courthouse, 601 Market Street, Philadelphia, Pennsylvania 19106, Courtroom 15A, or at such other location and time as set by the Court, for entry of a Judgment approving the Settlements as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of

Allocation as fair and reasonable. A proposed Judgment and Order granting the requested relief will be submitted with Lead Plaintiffs' reply papers after the deadlines for objecting to the Settlements and requesting exclusion from the Settlement Class have passed.

Dated: September 17, 2018

Respectfully submitted,

CHIMICLES & TIKELLIS LLP

/s/ Robert J. Kriner, Jr.

Robert J. Kriner, Jr. (Bar No. 2546)
Vera G. Belger (Bar No. 5676)
222 Delaware Avenue, 11th Floor
P.O. Box 1035
Wilmington, DE 19899
Phone: (302) 656-2500
Fax: (302) 656-9053

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

Hannah Ross
Katherine M. Sinderson
Lauren McMillen Ormsbee
1251 Avenue of the Americas
New York, NY 10020
Phone: (212) 554-1400
Fax: (212) 554-1444

SAXENA WHITE P.A.

Maya S. Saxena
Joseph E. White, III
Brandon T. Grzandziel
Kathryn W. Weidner
150 E. Palmetto Park Road, Suite 600
Boca Raton, FL 33432
Telephone: (561) 394-3399
Fax: (561) 394-3382

-and -

Steven B. Singer
10 Bank Street, 8th Floor
White Plains, NY 10606

Telephone: (914) 437-8551
Fax: (888) 631-3611

*Counsel for Lead Plaintiffs and Co-Lead
Counsel for the Class*